

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN HOLMQUIST,

Defendant.

NO. CR22-180 LK

GOVERNMENT'S SENTENCING  
MEMORANDUM

The United States of America, by and through Tessa M. Gorman, United States Attorney for the Western District of Washington, and Casey S. Conzatti, Assistant United States Attorney for said District, files this sentencing memorandum, requesting that Mr. Holmquist be sentenced to 36-months in custody.

***Recommended Sentence***

The government recommends that the Court sentence Mr. Holmquist to 36-months in custody, followed by three years of supervised release, subject to the conditions recommended by Probation.

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1 *Factual and Procedural History*

2 Mr. Holmquist is charged following an investigation into a drug trafficking  
3 organization (“DTO”) within the Western District of Washington. Mr. Holmquist was  
4 identified as a redistributor for the DTO which was led by co-defendant Jose Paleo.

5 In January 2021, the FBI identified Mr. Paleo as a large methamphetamine  
6 distributor operating in Western Washington. During the investigation, through physical  
7 and electronic surveillance, travel records, and a variety of other investigative techniques,  
8 agents were able to determine that the Paleo DTO was being supplied by a Mexico-based  
9 DTO. Agents determined that the Paleo DTO picked up narcotics in the Los Angeles area  
10 and transported them to the Seattle area for redistribution. Law enforcement agencies  
11 contacted Mr. Paleo on several occasions during the investigation, which led to seizures  
12 of cash and distribution quantities of narcotics. Investigators learned that Mr. Holmquist  
13 was a redistributor for the Paleo DTO, specifically that Mr. Holmquist was redistributing  
14 methamphetamine supplied by Mr. Paleo.

15 During the investigation, agents seized large quantities of narcotics from  
16 Mr. Paleo on two occasions. On the first seizure on January 8, 2021, agents conducted a  
17 traffic stop on Mr. Paleo, two males and a female in a white Malibu. During the search of  
18 the vehicle, agents recovered numerous blue pills stamped “M30” suspected to contain  
19 fentanyl, with a net weight of 91 grams, 440 net grams of methamphetamine and \$8,600  
20 in U.S. currency. Over a year later, on April 28, 2022, agents executed a warrant on a  
21 short-term rental property that was being used as a stash house for the Paleo DTO. Inside  
22 the location, agents located 9mm Luger ammunition, approximately 1,561 grams of  
23 heroin, 37 grams of suspected fentanyl-laced pills, 830 grams of suspected fentanyl  
24 powder, and 14,707 grams of methamphetamine.

25 The investigation also involved the use of two court-authorized Title III wire  
26 intercepts. The first intercepts began on April 21, 2022, and authorized the interception of  
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1 wire and electronic communications over TT20 and TT25, used by Mr. Paleo, and TT26,  
2 used by Miguel Thomas.<sup>1</sup> The second round of interceptions began on August 31, 2022,  
3 and authorized the interception of wire and electronic communications over TT51 used  
4 by Mr. Paleo, TT33 used by co-defendant Octavio Guzman, and TT50 used by Augustin  
5 Gutierrez Valencia<sup>2</sup>, as well as wire communications on TT52 also used by Mr. Paleo.  
6 The wiretaps and other investigative techniques revealed three conspiracies charged over  
7 six total indictments with twenty individuals indicted.

8 Agents intercepted a number of communications between Mr. Holmquist and  
9 Mr. Paleo during the wiretap that began on April 21, 2022. On one occasion, on May 7,  
10 2022, Mr. Paleo called Mr. Holmquist at approximately 10:06 p.m., during this call  
11 Mr. Paleo asked Mr. Holmquist if he needed any “water” [methamphetamine].  
12 Mr. Holmquist responded that he only needed “two” [two pounds], because he had a big  
13 order coming shortly. On May 9, 2022, at approximately 6:55 p.m., Mr. Holmquist sent a  
14 text message to Mr. Paleo asking if Mr. Paleo had “seven waters” [seven pounds of  
15 methamphetamine]. These intercepts indicate that Mr. Holmquist was purchasing  
16 multiple pounds of methamphetamine from Mr. Paleo for redistribution.

17 On October 19, 2022, the Grand Jury returned two indictments charging a total  
18 11 defendants with seven counts, including Conspiracy to Distribute Controlled  
19 Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, Possession with Intent to  
20 Distribute, in violation of 21 U.S.C. § 841(a)(1), Conspiracy to Commit Money  
21 Laundering, in violation of 18 U.S.C. §§ 1956(h), 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii),  
22 and Carrying a Firearm During and in Relation to a Drug Trafficking Crime, in violation  
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24 <sup>1</sup> Mr. Thomas was charged under *United States v. Jose Paleo et al.* (CR22-180), as well as *United States v. Abel*  
25 *Cruz et al.* (CR22-179).

26 <sup>2</sup> Mr. Gutierrez Valencia is charged under a separate indictment in front of this Court (CR22-151 LK), with five co-  
27 defendants for conspiracy to distribute controlled substances and multiple possession of controlled substances with  
intent to distribute charges, based on the transportation of narcotics, including methamphetamine, cocaine, fentanyl  
laced pills, and fentanyl powder from Los Angeles, CA, to Seattle, WA.

1 of 18 U.S.C. § 924(c). Mr. Holmquist was charged with one count of Conspiracy to  
2 Distribute Controlled Substances in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and  
3 846.

4 On October 25, 2022, the FBI executed a search warrant at Mr. Holmquist's  
5 residence. During the search of Mr. Holmquist's residence, agents recovered  
6 approximately 40 grams of methamphetamine, and 40 grams of heroin. Additionally,  
7 agents recovered one Ruger Security-9 pistol from inside Mr. Holmquist's residence, as  
8 well as ammunition, magazine, and accessories.

9 Mr. Holmquist was arrested pursuant to the arrest warrant issued under the  
10 indictment following the search of his residence. Mr. Holmquist was arraigned on the  
11 indictment on the same day. Dkt. 46. Mr. Holmquist pled not guilty. *Id.* On July 5, 2024,  
12 Mr. Holmquist pled guilty to one count of Conspiracy to Distribute Controlled  
13 Substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 846. Dkt 265.

#### 14 ***Guideline Calculations***

15 The Presentence Investigation Report (hereinafter "PSR") correctly calculates  
16 Mr. Holmquist's base offense level to be 32 as the offense involved at least  
17 3,000 kilograms but less than 10,000 kilograms of converted drug weight. PSR ¶ 35. The  
18 government agrees with the two-level increase applied to the offense as Mr. Holmquist  
19 was in possession of a firearm as part of the offense. PSR ¶ 36. Mr. Holmquist appears to  
20 have accepted responsibility for his actions, indicating to Probation that he greatly  
21 regretted his involvement in the instant matter. PSR ¶ 31. Based on Mr. Holmquist's  
22 acceptance of responsibility, the government believes that Mr. Holmquist should receive  
23 a three-level decrease, making the total offense level 31. Mr. Holmquist's Criminal  
24 History Category is III, resulting in an advisory range of **135-168 months**.

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1 ***Sentencing Analysis***

2 The United States respectfully submits that 36-months of imprisonment is  
3 sufficient, but not more than necessary, to comply with the purpose set forth in § 3553(a).

4 The Nature and Circumstances of the Offense

5 Mr. Holmquist was a redistributor for a DTO operating in the Western District of  
6 Washington. Mr. Holmquist was intercepted placing orders from the DTO leader for  
7 methamphetamine. Over two phone calls, Mr. Holmquist ordered approximately  
8 nine pounds of methamphetamine from Mr. Paleo. While agents did not find extremely  
9 large quantities of drugs at Mr. Holmquist's residence when they executed the search  
10 warrant, they did find distribution amounts of both methamphetamine and heroin, along  
11 with a firearm.

12 The effects of drug trafficking are massive, and in some respects, incalculable,  
13 especially when all the collateral consequences are considered. The drugs Mr. Holmquist  
14 was peddling cause irreparable harm to the community in general as well as to the  
15 families whose members are addicted to controlled substances. Furthermore, while  
16 dealing in these deadly drugs, Mr. Holmquist was in possession of a firearm,  
17 ammunition, and accessories making his crime even more dangerous. A sentence of 36-  
18 months in custody is necessary to impress upon Mr. Holmquist the seriousness of his  
19 crimes.

20 History and Characteristics of the Defendant

21 The government's recommendation takes into account Mr. Holmquist's struggle  
22 with addiction. By the age of 19, Mr. Holmquist was regularly using heroin and  
23 marijuana. Two years later, at 21, Mr. Holmquist was introduced to methamphetamine,  
24 which he quickly began to use on a daily basis in conjunction with heroin. During the  
25 course of his life, Mr. Holmquist sought services for his substance use disorder eight  
26 times, but continued to relapse rather quickly. Knowing the addictive and destructive  
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1 nature of these drugs, Mr. Holmquist continued to sell them and contributed to the  
2 addiction of an unknown number of individuals.

3       However, the government also takes into account Mr. Holmquist's progress since  
4 his arrest in this case. After being arrested, and released, Mr. Holmquist enrolled in an  
5 inpatient treatment program located in Coeur d'Alene, Idaho, which he completed on  
6 March 10, 2023. Following the inpatient treatment, Mr. Holmquist enrolled in aftercare  
7 services at Snoqualmie Behavioral Health Services, located in Snoqualmie, Washington.  
8 On June 13, 2024, he successfully completed all treatment services. Mr. Holmquist  
9 appears to have maintained sobriety since completing these treatment services.

10       Taking all of this into consideration, the government has allowed Mr. Holmquist  
11 to plead to a lesser-included offense where there are no mandatory minimum sentences  
12 that Mr. Holmquist is facing. A sentence of 36-months is well below the advisory range,  
13 and is sufficient, but not more than necessary, to comply with the purposes set forth in  
14 18 U.S.C. § 3553(a).

15 The Need to Promote Respect for the Law, Provide Just Punishment, and Afford  
16 Deterrence.

17       A 36-month sentence would promote respect for the law, provide a just  
18 punishment, and afford deterrence to others thereby protecting the public. Mr. Holmquist  
19 engaged in the distribution of deadly and addictive drugs. Mr. Holmquist has had  
20 numerous encounters with the criminal justice system and has remained undeterred from  
21 returning to similar behavior. A sentence of 36-months is the longest term of custody  
22 Mr. Holmquist will have served but is appropriate given his conduct in the instant matter.

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1 In light of all of these factors, the government believes that a sentence of 36-  
2 months of imprisonment followed by three years of supervised release, subject to the  
3 conditions recommended by Probation is appropriate.  
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5 DATED this 18th day of September, 2024.

6 Respectfully submitted,

7 TESSA M. GORMAN  
8 United States Attorney

9 /s/ Casey S. Conzatti

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